

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JUNE E. ADAMS IRREVOCABLE TRUST
DATED 7/21/14 FBO EDWARD ROBERT
ADAMS, individually and on behalf of all
others similarly situated,

Plaintiff,

vs.

INTERNATIONAL BUSINESS MACHINES
CORPORATION, VIRGINIA M. ROMETTY,
MARTIN J. SCHROETER, JAMES J.
KAVANAUGH and ARVIND KRISHNA,

Defendants.

Case No. 7:22-cv-02831-VB

CLASS ACTION

**DECLARATION OF JOSEPH R. SEIDMAN, JR.
IN SUPPORT OF BRUCE SCOTLAND, SARAH SCOTLAND, REBECCA SCOTLAND,
PRISCILLA SCOTLAND, AND JESSICA PLOEGER'S MOTION FOR
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF COUNSEL**

I, JOSEPH R. SEIDMAN, JR., hereby declare under penalties of perjury that:

1. I am Senior Counsel with Bernstein Liebhard LLP. I make this Declaration in Support of Bruce Scotland, Sarah Scotland, Rebecca Scotland, Priscilla Scotland, and Jessica Ploeger's ("Movants") Motion for Appointment as Lead Plaintiff and Approval of Counsel. The matters set forth herein are within my personal knowledge.

2. Attached hereto are true and correct copies of the following documents:

Exhibit A: The notice announcing the pendency of this action pursuant to 15 U.S.C. § 78u-4(a)(3)(A)(i);

Exhibit B: Movants' sworn certifications pursuant to 15 U.S.C. § 78u-4(a)(2)(A);

Exhibit C: Movants' Loss Chart; and

Exhibit D: Firm Résumé of Bernstein Liebhard LLP.

Executed: June 6, 2022

/s/ Joseph R. Seidman, Jr.
JOSEPH R. SEIDMAN, JR.

CERTIFICATE OF SERVICE

I, Joseph R. Seidman, Jr., hereby certify that on June 6, 2022, a true and correct copy of the foregoing was served in accordance with the Federal Rules of Civil Procedure with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all parties with an email address of record who have appeared and consented to electronic service in this action.

Dated: June 6, 2022

/s/ Joseph R. Seidman, Jr.
Joseph R. Seidman, Jr.